

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION

This document relates to:

All Cases noted on Attached Appendix A

MDL No. 2804

Case No. 1:17-md-2804

JUDGE DAN AARON POLSTER

**STIPULATION AND ORDER
DISMISSING WITH PREJUDICE CLAIMS
PURSUANT TO JANSSEN ALABAMA STATE-WIDE OPIOID SETTLEMENT
AGREEMENT**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel of record for the Alabama Dismissing Plaintiffs identified in Appendix A and Defendants Johnson & Johnson, Janssen Pharmaceuticals, Inc., Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a Janssen Pharmaceuticals, Inc., and Janssen Pharmaceutica, Inc. n/k/a Janssen Pharmaceuticals, Inc. (collectively and together with their Released Entities, the “Janssen Defendants”¹) that, pursuant to the election of the Dismissing Plaintiffs to participate in the Janssen Alabama State-Wide Opioid Settlement Agreement, which was announced on and dated April 1, 2022, which is binding on the Dismissing Plaintiffs and the Janssen Defendants, and which has an Effective Date of April 1, 2022 (a copy of which is attached as Appendix B), all claims of the Dismissing Plaintiffs identified in Appendix A attached hereto, against any Janssen Defendant are hereby voluntarily **DISMISSED, PRO TANTO, WITH PREJUDICE**, with each party to bear its own costs. The Circuit Court of Montgomery County, Alabama, shall retain jurisdiction with respect to the Janssen

¹ The Released Entities are each and every entity of any of the Janssen Defendants that is a “Released Entity” as set forth in Section II.26 of the Janssen Alabama State-Wide Opioid Settlement Agreement, dated as of April 1, 2022, a copy of which is attached as Appendix B.

Settlement Agreement to the extent provided under that Agreement.²

February 21, 2023

Agreed as to form and substance:

/s/ Christina D. Crow

Christina D. Crow (ASB-0637-C58C)
Jinks, Crow & Dickson, P.C.
Post Office Box 350
Union Springs, AL 36089
(334) 738-4225
ccrow@jinkslaw.com

/s/ Matthew D. Conn

Matthew D. Conn (ASB-9628-T83C)
Friedman, Dazzio & Zulas, P.C.
3800 Corporate Woods Drive
Birmingham, AL 35242
(205) 278-7000
mconn@friedman-lawyers.com

/s/ Keith Jackson

Keith Jackson (ASB-7519-J66B)
Riley & Jackson, P.C.
3530 Independence Drive
Birmingham, AL 35209
(205) 879-5000
kj@rileyjacksonlaw.com

Alabama Local Government Executive Committee

Agreed as to form and substance:

/s/Charles C. Lifland

Charles C. Lifland

² Previous stipulations filed in this Court pursuant to the Janssen Alabama State-Wide Opioid Settlement Agreement represented that this Court shall retain jurisdiction with respect to that Settlement Agreement. As stated in the Settlement Agreement, we clarify here that the Circuit Court of Montgomery County, Alabama has jurisdiction over the Janssen Alabama State-Wide Opioid Settlement Agreement.

O'MELVENY & MYERS LLP
400 S. Hope Street
Los Angeles, CA 90071
Telephone: (213) 430-6000
Facsimile: (213) 430-6407
clifland@omm.com

*Attorney for Defendants Janssen
Pharmaceuticals, Inc., Johnson &
Johnson, Janssen Pharmaceutica, Inc.
n/k/a Janssen Pharmaceuticals, Inc., and
Ortho-McNeil-Janssen Pharmaceuticals,
Inc. n/k/a Janssen Pharmaceuticals, Inc.*

SO ORDERED this ___ day of February,
2023.

Hon. Dan Aaron Polster
United States District Judge